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5 UNITED STATES DISTRICT COURT

6 DISTRICT OF ARIZONA

7
8 THE UNITED STATES OF AMERICA,) Case NO. 11CR-00794-01
9)
10 Plaintiff,) MOTION FOR DISCLOSURE; MOTION TO
vs.) UNSEAL APPLICATION FOR SEARCH
11) WARRANT (IF APPLICABLE), AFFIDAVIT
12 1. DINO SISNEROS,) IN SUPPORT OF SEARCH WARRANT,
Defendant.) SEARCH WARRANT, AND INVENTORY FROM
13) SEARCH WARRANT
14)
15)

16 Excludable delay under 18 U.S.C. 3161(h)(1)(F) will occur as a
17 result of this motion or of an order based thereon.

18 Defendant, by and through counsel undersigned, hereby moves
this Court for an order to unseal the application for search warrant
(if applicable), affidavit in support of search warrant, search
warrant, and any inventory for all items seized from the search
warrant in Case No. 07-00703-M. The materials at issue were seized
from Defendant Sisneros' residence. These materials are included
apparently in the Government's disclosure in this matter. Counsel
undersigned thought that this issue was solved at the last pretrial
conference, but apparently not. Counsel undersigned has been told by
the Government that the Government will not disclose these materials

1 without a court order mandating disclosure and unsealing these
2 materials.

3 The Government, per Jon Granoff, has no objection to this
4 motion.

5 WHEREFORE, Defendant moves this Court for an order unsealing
6 the documents at issue in Case No. 07-00703M and ordering the
7 Government to disclose same.

8 RESPECTFULLY SUBMITTED this 24th day of Aug., 2011.

9 */s/Matthew C. Davidson*
10 Matthew C. Davidson,
11 Attorney for
12 Defendant

13 Copy of the foregoing
14 Efiled this 24th day of
Aug., 2011 to;

15 Assistant United States Attorney

16 Co-Counsel

17 By: MCD